

REFORM

Preventing youth homelessness

An assessment of local approaches

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May 2019

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#reformpublicservices

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Executive summary

This report examines the approaches taken by local authorities to prevent homelessness for 16-24-year-olds. It assesses how far the Homelessness Reduction Act (HRA) has led to a coordinated response from across public services and considers ways local and national government can build upon the legislation to establish a more holistic and preventative approach to youth homelessness.

The impact of the HRA

Youth homelessness is predictable, enabling interventions to be put in place before young people are in crisis. However, the current legal landscape is geared towards crisis point. Local housing authorities have been given responsibility for preventing homelessness but are rarely the first port-of-call for young people at risk. For early intervention to be effective, other public bodies including schools, youth services, and leaving care teams have a crucial role to play.

Although the HRA marks a step in the right direction, the extent to which it has been embraced as a wider opportunity to cooperate to prevent homelessness has been mixed. How local authorities have chosen to meet new duties varies significantly from authority to authority and, too often, good practice continues to be the result of diligent individuals going above and beyond their statutory duties. For homelessness prevention to be genuinely seen as a responsibility that extends beyond the local housing authority, the legal framework needs to be revised to better reflect this.

Building on the HRA

While the HRA represents a necessary step-change in homelessness legislation, it is the foundation on which local authorities can build and develop innovative solutions to tackle youth homelessness. As it stands, there is considerable variation in the approaches taken by local authorities to prevent youth homelessness, leading to a postcode lottery in the quality of service provision. This variation can be seen in the availability and quality of early intervention initiatives, such as family mediation and schools-based programmes, as well as the arrangements in place to facilitate collaboration between services.

A stronger national presence is needed to support local efforts to tackle youth homelessness and variations in service quality. Crucially, this national agenda must be cross-departmental, moving from the assumption that homelessness is a peripheral issue for departments beyond the Ministry of Housing, Communities and Local Government (MHCLG). Informed by an understanding of young people's needs, this national agenda should include the establishment of a national digital youth homelessness service. Efforts must also be made to tackle the structural causes of youth homelessness, including the lack of affordable housing and welfare restrictions facing young people, without which local efforts to tackle youth homelessness can only go so far.

Tackling short-termism

For local authorities to implement policies to prevent youth homelessness, they must be financed in a way that allows for long-term planning and sustained transformation. Funding must be sufficient to support large-scale policy changes such as the HRA, and also to sustain non-statutory services. Protected funding that is assured for longer periods of time can allow local authorities the security to develop effective policies to tackle youth homelessness. Central and local government must also be careful that the focus on ending rough sleeping does not divert attention away from preventing other, less visible forms of homelessness.

Recommendations

1. The Ministry of Housing, Communities and Local Government should require local authorities to record certain information about the referrals they receive under the duty to refer. At a minimum, this should include the referral body and the age range of the individual referred. This would help local authorities monitor what public bodies encounter young people at risk of homelessness, which could help local authorities to strengthen relationships with these services.
2. The Ministry of Housing, Communities and Local Government should extend the minimum requirements under section 213B of the Homelessness Reduction Act, which specifies what constitutes a referral under the duty to refer, to include at a minimum and with their consent, an individual's date of birth and their date of expected homelessness. This will ensure that local authorities can identify individuals who have been referred through the duty to refer.
3. The Ministry of Housing, Communities and Local Government should require and resource local housing authorities to train public authorities with a duty to refer, to ensure these services can recognise and respond to early warning signs of young people at risk of becoming homeless. Public authorities with a duty to refer should be required to participate in this training.
4. Government should extend the duty to refer to a wider range of public bodies, such as schools, further education colleges, and the police, to reflect those that are well-placed to recognise the early warning signs of youth homelessness. Frontline services who sit outside this legal remit, such as GPs, should be encouraged to sign up to a voluntary "commitment to refer," based on the model developed by the National Housing Federation.
5. The Cabinet Office in conjunction with the Department for Work and Pensions, the Department of Health and Social Care, the Department for Education, the Ministry of Justice and the Home Office should produce guidance on what reasonable steps each department can take to prevent and relieve homelessness. These steps should be embedded within each department's own legislative and regulatory framework to ensure legal accountability.
6. The Ministry of Housing, Communities and Local Government should update their guidance for local authorities with advice on how to prevent youth homelessness. The Ministry should also ensure that homelessness prevention strategies, which are created by local authorities, include a section specifically related to the needs of young people.
7. A young person's personalised housing plan, it should include, at a minimum, options for mediation or other accommodation and clear advice on benefits, employment, and mental health support. Anonymised personalised housing plans must be available for audit from the Ministry of Housing, Communities and Local Government to ensure minimum standards are being adhered to.
8. A digital national youth homelessness service, to be available 24/7, should be established to provide advice and support to young people through online one-to-one chats, crisis messenger services, and monitored discussion boards.
9. Based on a review of reasonable steps that departments could take to prevent youth homelessness, a portion of funding from the Ministry of Housing, Communities and Local Government, the Department for Work and Pensions, the Department of Health and Social Care, the Department for Education, the Ministry of Justice, and the Home Office should be pooled and ringfenced to ensure that responsibility for tackling youth homelessness across government is shared.
10. Short-term grants for homelessness prevention should be replaced with longer, ring-fenced funding cycles to give local authorities more security to develop effective prevention practices.

Introduction

Young people are at particular risk of experiencing homelessness.¹ In 2017-18, it was estimated that 103,000 young people presented to their local housing authority as homeless, with less than half receiving “meaningful support.”² The human costs of youth homelessness are devastating, with lasting implications for mental health, educational attainment, and employment prospects.³

The causes of youth homelessness are well-known, and interventions can be made before young people become homeless. Poverty,⁴ being a care leaver,⁵ suffering from mental health problems, abuse, or having had behavioural problems at school,⁶ are among the factors that make homelessness more likely. Early interventions are more likely to be effective, and less costly, than intervening at crisis point.⁷ The responsibility for effective early intervention, however, cannot sit solely with local housing authorities. This is because youth homelessness is rarely just a housing issue, and so recognising and responding to the early warning signs of homelessness requires a coordinated response from across public services.⁸

The Homelessness Reduction Act 2017 (HRA), which came into force on 3 April 2018, placed a strong emphasis on prevention and collaboration. It has been described as “one of the biggest changes to the rights of homeless people in England for 15 years.”⁹ This can be seen as part of a renewed focus on homelessness in media and politics, which has seen the government pledge to eliminate rough sleeping by 2027.¹⁰ The HRA firmly places the responsibility on local authorities to deliver change and react to the needs of their communities, and so how local authorities are meeting these new duties varies significantly. This has the potential to create effective localised responses at best, and a postcode lottery in service quality at worst.¹¹

The approaches taken by local authorities to prevent youth homelessness are only part of the story. With a decline in social housing, more young people are forced into the private rented sector, and face age-related discrimination and increasing rental costs.¹² Furthermore, restrictions to welfare entitlements, such as the Local Housing Allowance being capped at a Shared Accommodation Rate for under-35s, a lower rate of Universal Credit for single under-25s, and a lower minimum wage – despite the same level of outgoing costs as someone older – adversely affect young people and make renting increasingly difficult.¹³ These structural issues are at the heart of the problem and therefore limit local authorities’ abilities to prevent youth homelessness.¹⁴

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- 1 Suzanne Fitzpatrick et al., *The Homelessness Monitor: England 2013* (Crisis, 2013), 47; Beth Watts, Sarah Johnsen, and Filip Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation* (Heriot-Watt University, 2015), 10.
 - 2 Hannah Webster and Stacy Wairumbi, *Making Homeless Young People Count: The Scale of Youth Homelessness in the UK* (Centrepont, 2018), 5.
 - 3 Centrepont, ‘Youth Homelessness: The Effects’, Webpage, Centrepont, 2019; Shelter, *Young People and Homelessness* (Shelter, 2005), 10.
 - 4 Isobel Anderson and Julie Christian, ‘Causes of Homelessness in the UK: A Dynamic Analysis’, *Journal of Community and Applied Social Psychology* 13, no. 2 (April 2003): 111.
 - 5 Kaitlin Schwan et al., *Preventing Youth Homelessness: An International Review of Evidence* (Wales Centre for Public Policy, 2018), 8–9.
 - 6 Department for Communities and Local Government, *Making Every Contact Count: A Joint Approach to Preventing Homelessness*, 2012, 9.
 - 7 Centrepont, *Preventing Youth Homelessness: What Works?*, 2016, 11; Department for Communities and Local Government, *Making Every Contact Count: A Joint Approach to Preventing Homelessness*, 6; Ruth Jacob, *Preventing Homelessness: It’s Everybody’s Business* (Crisis, 2018), 8.
 - 8 Jacob, *Preventing Homelessness: It’s Everybody’s Business*, 8.
 - 9 Shelter, *Homelessness Reduction Act 2017: Policy and Practice Briefing*, (Shelter, 2018), 4.
 - 10 Ministry of Housing, Communities & Local Government, *Rough Sleeping Strategy*, 2018; Suzanne Fitzpatrick et al., ‘The Homelessness Monitor: England 2018’, 2018, 116.
 - 11 Sarah Dobie, Ben Sanders, and Ligia Teixeira, *Turned Away: The Treatment of Single Homeless People by Local Authority Homelessness Services in England* (Crisis, 2014).
 - 12 Homeless link, ‘Young & Homeless 2018’, 2018, 3.
 - 13 Watts, Johnsen, and Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation*, 9; Homeless link, ‘Young & Homeless 2018’, 3; ‘Universal Credit: What You’ll Get’, Web Page, GOV.UK, 2019.
 - 14 Shelter’s commission on the future of social housing, *Building for Our Future: A Vision for Social Housing* (Shelter, 2018); Billy Harding, *Ready to Move on: Barriers to Homeless Young People Accessing Longer-Term Accommodation* (Centrepont, 2018); Homeless link, ‘Young & Homeless 2018’; Watts, Johnsen, and Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation*.

Working within these constraints, local authorities have an essential role to play. This paper looks at the impact of the HRA on the approaches taken by local authorities to prevent homelessness for 16-24-year-olds. It examines how far the HRA has established a coordinated response across public services, how local authorities can build upon the legislation and the importance of long-term thinking. The report is informed by 45 semi-structured interviews, including 19 local authorities and two Freedom of Information (FOI) requests (see Appendix for methodology), and demonstrates the stark variation in standards across local authorities in their efforts to tackle and prevent youth homelessness.

1








Impact of the Homelessness Reduction Act

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Building on the wider trajectory of increasing legal obligations to support young people at risk of homelessness (see Figure 1), the introduction of the HRA in April 2018 represented a landmark change to English homelessness legislation and places significantly more responsibility on local authorities to prevent homelessness (see Figure 9 in Appendix).¹⁵ Under the HRA, which established a 'duty to refer', a range of public authorities (e.g. youth offender institutions, secure colleges, jobcentres and hospitals) must now notify a local housing authority if they think one of their service users may be homeless or at risk of becoming homeless and agrees to the referral.¹⁶

While the HRA marks a step in the right direction, interviews and FOIs conducted for this paper show that in addition to legislative change, every local authority must foster a culture that embraces a holistic approach to prevention to develop a coordinated response to youth homelessness.

Figure 1: Overview of homelessness legislation pertaining to young people 1977-2018¹⁷

	1977 Housing (Homeless Persons) Act "Main homelessness duty" established, requiring local housing authorities to house some groups of homeless people in priority need for the first time.
	1996 Housing Act Definition of a household in priority need established.
	2002 Homelessness Act Pushed forward a more preventative approach to tackling homelessness and introduced requirements on local authorities to produce prevention-focused homelessness strategies every five years.
	2002 Homelessness (Priority Need for Accommodation) (England) Order Priority need extended to some groups of young people.
	2009 Southwark Judgement Primary responsibility for 16-17-year-olds who are homeless lies with children's services.
	2015 Hotak v London Borough of Southwark Local authorities must consider how vulnerable someone is compared to the ordinary person, not someone who is already homeless.
	2017 Homelessness Reduction Act Renewed focus on prevention, personalisation and joint working.

Source: HM Government, *Housing (Homeless Persons) Act 1977*, 1977; HM Government, *Housing Act 1996*, 1996; HM Government, *Homelessness Act 2002*, 2002; The Secretary of State for Transport, Local Government and the Regions, 'The Homelessness (Priority Need for Accommodation) (England) Order' (2002); Shelter, *Responding to Youth Homelessness Following G v LB Southwark Judgment*, 2009; The Supreme Court, 'Hotak v London Borough of Southwark' (2015); HM Government, *The Homelessness Reduction Act 2017*, Chapter 19.

¹⁵ Centrepoin, *The Homelessness Reduction Act: Will It Work for Young People?*, 2018, 8.

¹⁶ Ministry of Housing, Communities and Local Government, *A Guide to the Duty to Refer*, 2018, sec. 3.

¹⁷ HM Government, *Housing (Homeless Persons) Act 1977*, 1977; HM Government, *Housing Act 1996*, 1996; HM Government, *Homelessness Act 2002*, 2002; The Secretary of State for Transport, Local Government and the Regions, 'The Homelessness (Priority Need for Accommodation) (England) Order' (2002); Shelter, *Responding to Youth Homelessness Following G v LB Southwark Judgment*, 2009; The Supreme Court, 'Hotak v London Borough of Southwark' (2015); HM Government, *The Homelessness Reduction Act 2017*, Chapter 19.

1.1 Responsibility for prevention

The current legislative framework places responsibility for preventing and relieving homelessness with local housing authorities.¹⁸ For under-18's, however, the primary responsibility lies with children's services.¹⁹ Yet, this legal landscape does not reflect the way young people at risk of homelessness interact with public authorities, as housing authorities are rarely the first destination for at-risk young people and their families.²⁰ Furthermore, although the HRA pushed forward a more preventative agenda (see Figure 9), early intervention before a person faces imminent risk remains outside the statutory framework of local housing authorities.²¹ As a result, the statutory duties of local authorities to support young people at risk of homelessness also remain heavily weighted at crisis point (see Figure 2).

Figure 2: Defining prevention

While the concept of prevention is popular, it has been loosely defined and can refer to a wide range of interventions at various points in time. Adopting the public health approach to prevention,²² the most prominent framework used to conceptualise homelessness prevention distinguishes between three broad levels of intervention:

- > primary intervention takes place well before homelessness may occur;
- > secondary prevention intervenes to help those at imminent risk of homelessness;
- > tertiary prevention works to prevent repeat homelessness.²³

In line with this approach, homelessness prevention can be broadly defined as “policies, practices, and interventions that reduce the likelihood that someone will experience homelessness.”²⁴ In comparison, the UK government's definition of prevention has a strong focus on secondary intervention, as “positive action taken by the local authority which provides someone who considers themselves at risk of homelessness with a solution for at least the next six months.”²⁵

The local housing authority is often the last port-of-call for a young person in need. Young people often rely on informal networks of support, such as sofa-surfing, and only seek external support at crisis point.²⁶ This was reflected in interviews for this paper; one local authority stated that young people only presented at the local authority once “they have exhausted every friend.” According to the London Assembly Housing Committee, only one in five homeless 16-24-year-olds in London seek help from their local authority.²⁷

18 Jacob, *Preventing Homelessness: It's Everybody's Business*, 8; Centrepont, *Preventing Youth Homelessness: What Works?*, 8.

19 Shelter, *Responding to Youth Homelessness Following G v LB Southwark Judgment*.

20 Abigail Gill, *Families under Pressure: Preventing Family Breakdown and Youth Homelessness* (Centrepont, 2016); Jacob, *Preventing Homelessness: It's Everybody's Business*, 4; Homeless link, 'Young & Homeless 2018'.

21 HM Government, *The Homelessness Reduction Act 2017*, sec. 1.; Figure 3.

22 World Health Organization, 'Disease Prevention', Web Page, World Health Organisation, 2019.

23 Centrepont, *Preventing Youth Homelessness: What Works?*, 10.

24 Stephen Gaetz and Erin Dej, *A New Direction: A Framework for Homelessness Prevention* (Canadian Observatory of Homelessness, 2017), 1.

25 Ministry of Housing, Communities and Local Government, *Statutory Homelessness and Prevention and Relief, January to March (Q1) 2018: England (Revised)*, 2018, 2.

26 Sarah McCoy, *Danger Zones and Stepping Stones: Phase Two* (Depaul, 2018); Abigail Gill, *Families under Pressure: Preventing Family Breakdown and Youth Homelessness*; Homeless link, 'Young & Homeless 2018'.

27 London Assembly Housing Committee, 'Hidden Homelessness in London', September 2017, 21.

Poor awareness of their housing rights, poor expectations about the response they might receive from statutory services, and a reluctance to identify themselves as homeless due to stigma, have all been cited as possible reasons for young people not presenting to their local housing authority.²⁸ Unfortunately, young people's belief in the futility of approaching local authorities is sometimes well-founded. Several charity workers interviewed for this paper raised concerns that young people are still not being properly assessed despite the introduction of the HRA. Multiple interviewees argued that although not always the case, within certain local authorities, there was an "ingrained culture" that failed to take the concerns of young people seriously, which could lead to attempts to reconnect the young person with their family even if it was unsafe to do so.

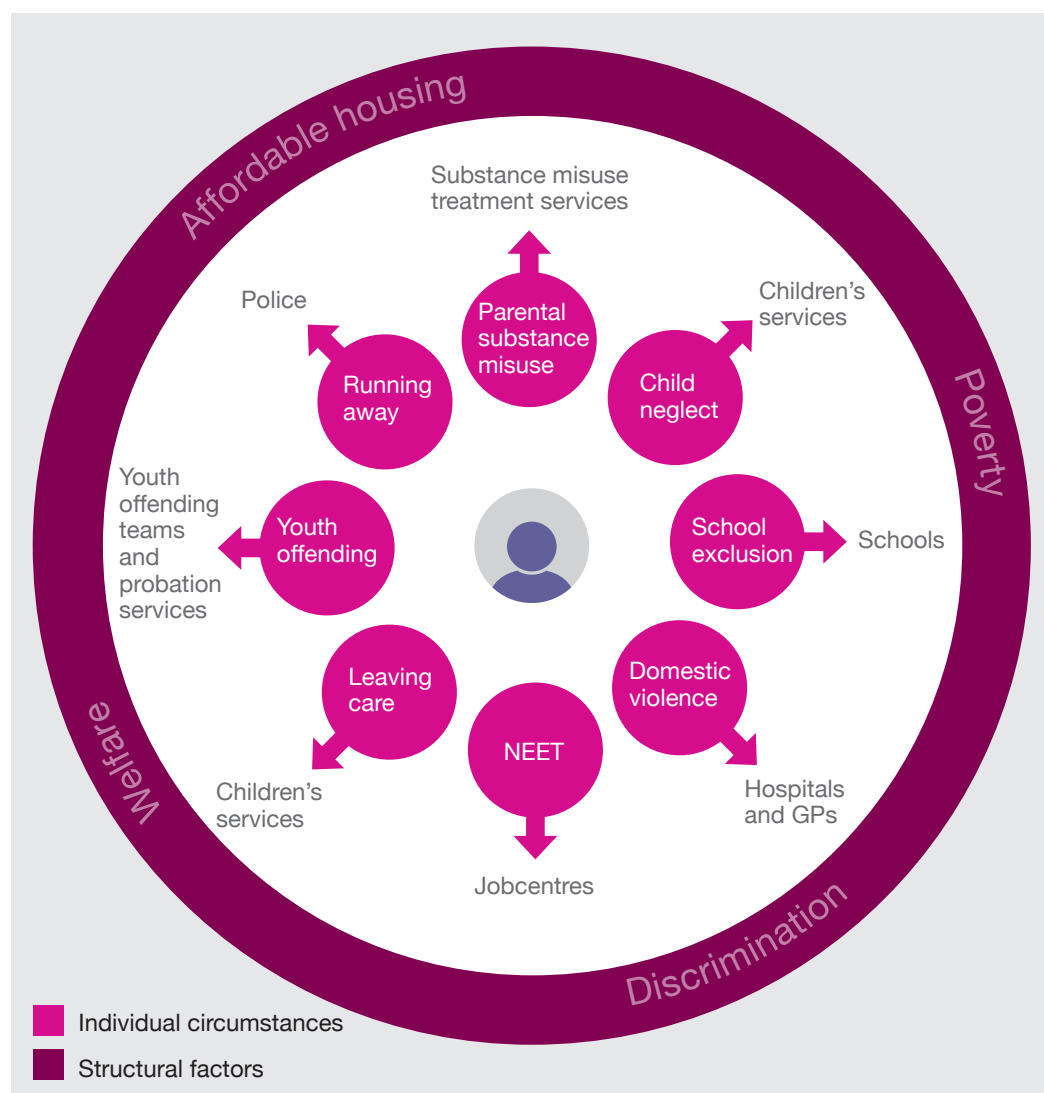
1.2 A coordinated response to prevention

Given that other public authorities are better placed than local housing authorities to recognise the early risk factors of youth homelessness, they have a crucial role to play.²⁹ While the interactions noted in Figure 3 are not exhaustive or prescriptive, they demonstrate that, for example, a young person who is excluded will first be in contact with their school, if they run away from home they may interact with the police and, if they are not in education, employment or training (NEET), they may be in contact with the local jobcentre. These authorities are therefore well-placed to recognise and respond to the earliest warning signs of youth homelessness.

²⁸ Shelter, *Young People and Homelessness*; Homeless link, 'Young & Homeless 2018'.

²⁹ Jacob, *Preventing Homelessness: It's Everybody's Business*.

Figure 3: How young people at greater risk of homelessness interact with public services



Sources: Watts, Johnson and Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation*, 5; Glen Bramley and Suzanne Fitzpatrick, *Hard Edges: Mapping Severe and Multiple Disadvantage, England* (Lankelly Chase Foundation, 2015); Department for Communities and Local Government, *Making Every Contact Count: A Joint Approach to Preventing Homelessness*; Reform Interviews.

1.3 Impact of the duty to refer

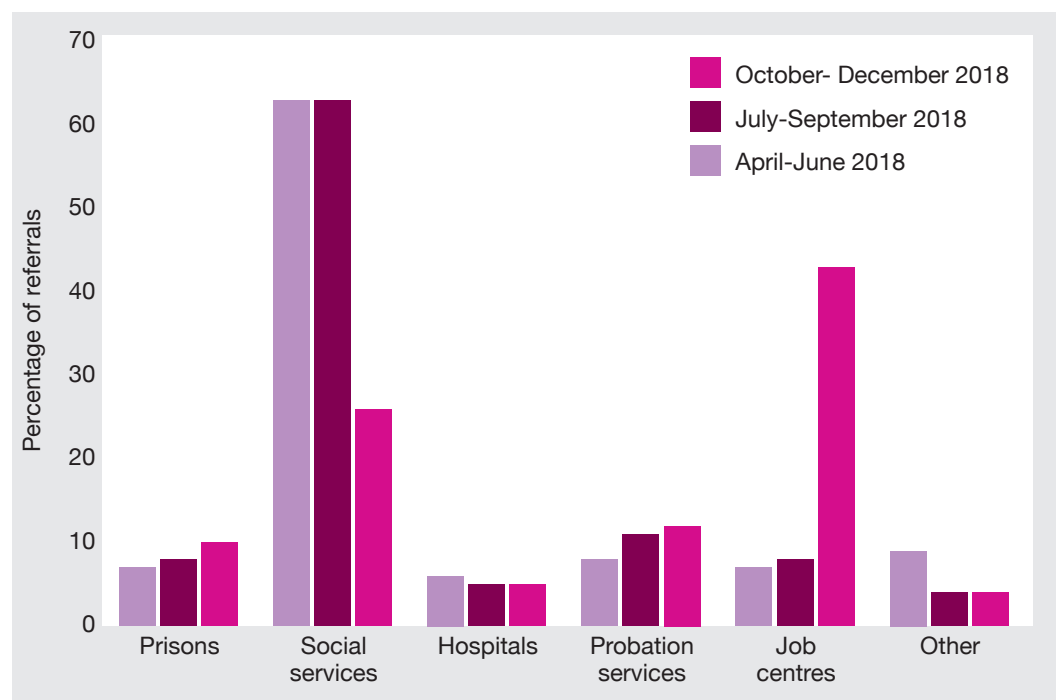
The introduction of the duty to refer under the HRA represents a legislative change that aims to create a more coordinated response to homelessness across several public bodies, but its impact on local housing authorities has varied significantly across the country. For some local authorities with well-established working relationships with other public services, the duty to refer has been seen to formalise a referral process that was already happening informally. For others, the duty to refer has represented a significant shift in working practices.

1.3.1 Where are referrals coming from?

Based on the responses of 219 local authorities to FOI requests sent by *Reform* for the purposes of this paper (FOI 2 – see Appendix for methodology), Figure 4 shows how many 16-24-year-olds were referred to the local housing authority from public authorities with a duty to refer following the introduction of the HRA. Overall, FOI 2 shows there has been a rise in recorded referrals following the introduction of the duty to refer in October 2017, with the total number of recorded referrals rising from 319 and 333 in April-June and July-September 2018 respectively, to 1383 in October-December 2018. This increase was largely attributed to the rise in recorded referrals from Jobcentres, whose recorded referrals increased from a total of 26 in July-September to 600 in October-December 2018.

As shown in Figure 4, from October-December 2018, Jobcentres accounted for 43 per cent of all the referrals made. This was reflected in interviews for this paper, as several local authorities expressed frustration that the Department for Work and Pensions (DWP) “waited until the 1 October 2018 before handing over all referrals at once”, creating an unexpected administrative burden upon its introduction. It should be noted, however, that not all local authorities recorded referrals before October 2018, and therefore, the rise may be partly attributed to local authorities increasingly recording information on referrals following the introduction of the duty to refer.

Figure 4: Referrals of 16-24-year-olds to local housing authorities from organisations with a duty to refer following the introduction of the HRA



Source: FOI responses from 219 local authorities who record this information (FOI 2).

NB: Not all local authorities recorded referrals before October 2018, and therefore, direct comparisons between each quarter cannot be made. “Other” refers to referrals made by young offending institutions and youth offending teams, secure training centres, secure colleges, emergency departments, urgent treatment centres, and youth offending teams. FOI request sent January 2019.

Forty-eight local authorities who responded to FOI 2 were unable to provide the requested information, either because they do not hold this data, or cannot split the data according to where the referrals are coming from or the age of the person referred. This suggests there is significant variation in how authorities are recording referrals made from different public authorities. Given that data is essential to developing strategies, monitoring progress, and designing interventions, the collection of better-quality data is crucial to ensure evidence-based decision making at both the local and national level. The Local Government Association's guidance on the duty to refer recommends that local housing authorities record and monitor a wider range of information about referrals beyond that collected by the Ministry of Housing, Communities and Local Government (MHCLG), including a breakdown of agencies that made referrals and demographic information of persons that have been referred, and provide an example referral form for this purpose.³⁰

Recommendation 1

The Ministry of Housing, Communities and Local Government should require local authorities to record certain information about the referrals they receive under the duty to refer. At a minimum, this should include the referral body and the age range of the individual referred. This would help local authorities monitor what public bodies encounter young people at risk of homelessness, which could help local authorities to strengthen relationships with these services.

1.3.2 Ensuring referrals are meaningful

In several interviews for this paper, local authorities stated that the effectiveness of referrals from public authorities to date varied significantly, both in terms of enabling the local authority to identify an individual and the level of risk they face. For example, several local authorities noted the “box-ticking” approach of the DWP following the introduction of the duty to refer, with referrals not always correctly identifying those at genuine risk of homelessness and creating unnecessary administrative burdens.

This was compounded by the fact that many local authorities stated that the DWP has chosen to use a national standardised form to refer those at risk, rather than use portals set up by many local authorities for this purpose, despite guidance from MHCLG advising that “the procedure for referrals should be decided by service partners in each local area.”³¹ Numerous authorities have stated this standardised form does not always provide the information needed to assess when someone is likely to be threatened with homelessness and, in some instances, referrals have even left out rudimentary information required to identify an individual, such as their date of birth. Indeed, this information is not required under existing legislation on the duty to refer.³²

Recommendation 2

The Ministry of Housing, Communities and Local Government should extend the minimum requirements under section 213B of the Homelessness Reduction Act, which specifies what constitutes a referral under the duty to refer, to include at a minimum and with their consent, an individual's date of birth and their date of expected homelessness. This will ensure that local authorities can identify individuals who have been referred through the duty to refer.

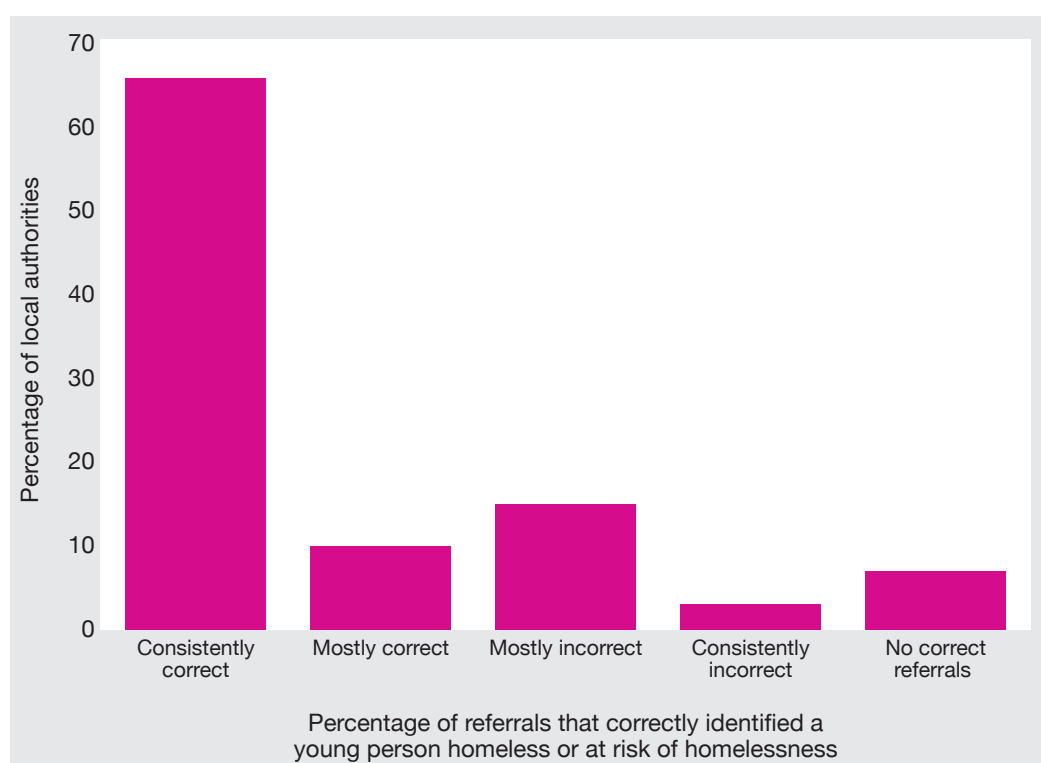
³⁰ Local Government Association, *Duty to Refer: An Opportunity to Cooperate to Tackle Homelessness*, 2018, 19.

³¹ Ministry of Housing, Communities and Local Government, *Homelessness Code of Guidance for Local Authorities*, 2018, sec. 4.5.

³² HM Government, *Homelessness Act 2002*; Matt Downie et al., *Everybody In: How to End Homelessness in Great Britain* (Crisis, 2018).

More generally, interviewees questioned whether other authorities subject to the duty to refer are adequately able to recognise a young person who is homeless or at risk of homelessness, with one interviewee stating, “a number of partners are not aware of the new duty and what it means.” Responses to FOI 2 revealed that 22 per cent of all the referrals made by public authorities with a duty to refer between October and December 2018 were deemed not homeless or at risk of homelessness within 56 days. However, as shown in Figure 5, the accuracy of referrals made to local authorities differed significantly between local authorities. 66 per cent of local authorities received consistently correct referrals of 16-24-year-olds through the duty to refer between October and December 2018, while 8 per cent of local authorities did not receive a single correct referral over the same period.

Figure 5: The proportion of local authorities who have received referrals of 16-24-year-olds through the duty to refer by the accuracy of referrals made (October-December 2018)



Source: FOI responses from 157 councils who received and recorded referrals through the duty to refer during this time period (FOI 2). “Consistently correct” refers to local authorities for whom more than 75 per cent of referrals received resulted in a young person being identified as homeless or a risk of homelessness within 56 days; “Mostly correct” refers to authorities who received correct referrals more than 50-75 per cent of the time; “Mostly incorrect” refers to authorities who received correct referrals more than 25-50 per cent of the time; and “Consistently incorrect” refers to authorities who received correct referrals 1-25 per cent of the time. FOI request sent in January 2019.

Effective referrals rely on public agencies being able to recognise and respond to early warning signs of youth homelessness. Guidance issued by MHCLG recognises that “it may be more difficult to identify a person who is threatened with homelessness” compared to someone sleeping rough.³³ MHCLG does not, however, require local housing authorities to provide training for public bodies with a duty to refer.

Responses from 249 local authorities to an FOI request for this paper (FOI 1) revealed 93 per cent of local authorities went beyond their statutory duties and provided training to

³³ Ministry of Housing, Communities and Local Government, ‘A Guide to the Duty to Refer’.

other public bodies to aid the preparation and execution of the duty to refer. However, as shown in Figure 6, the content of this training varied significantly.³⁴ 7 per cent provided only email advice, while 71 per cent provided in-person training sessions. How this in-person training was delivered also varied from authority to authority. For example, one authority noted they had delivered group training sessions, while another employed a duty to refer worker to deliver one-to-one training.

Figure 6: Training provided by local housing authorities to organisations with a duty to refer



Source: FOI responses from 249 local authorities (FOI 1). FOI request sent on 26 November 2018, and based on responses received between 27 November and 11 February 2018.

The provision of training in itself, however, does not guarantee that it is appropriate or of a high standard. While MHCLG's guidance on the issue is minimal, the Local Government Association has developed a range of supporting materials, including training materials and presentations, to help local authorities deliver training on the duty to refer.³⁵ Several local housing authorities interviewed for this paper also stressed that although they have offered training to public authorities with a duty to refer, with one local authority stating "it didn't get the take-up we'd hoped." Currently, there is no obligation for organisations with a duty to refer to engage in training, and an expert interviewed for this paper expressed that there are little consequences for public bodies who fail to deliver on this new statutory requirement.

Recommendation 3

The Ministry of Housing, Communities and Local Government should require and resource local housing authorities to train public authorities with a duty to refer, to ensure these services can recognise and respond to early warning signs of young people at risk of becoming homeless. Public authorities with a duty to refer should be required to participate in this training.

³⁴ Local Housing Authorities in England, *Freedom of Information Disclosure*, 2018.

³⁵ Ministry of Housing, Communities and Local Government, 'A Guide to the Duty to Refer', 4; Local Government Association, 'Duty to Refer Training Presentation', Webpage, Local Government Association, (2018).

1.4 Strengthening the legal framework

While the duty to refer has raised the minimum standard of communication between public authorities, the extent to which it has been embraced as a wider opportunity to cooperate to prevent homelessness has been mixed. For homelessness prevention to be genuinely seen as a responsibility that extends beyond the local housing authority, the legal framework should be revised to better reflect this.

1.4.1 Extending the duty to refer

The range of services who are given a duty to refer under the HRA does not fully reflect the number of public bodies likely to come into contact with young people at risk of homelessness, and several interviewees commented on the notable absence of schools, colleges, GPs, housing associations, and the police from this new duty. As shown in Figure 3, these public bodies may be the first point of contact for young people at risk of homelessness.

On the ground, many local housing authorities noted there were strong informal referral mechanisms between other public authorities and the local housing authority, with one local authority noting that “most schools and colleges know about us.”³⁶ Additionally, recognising their role in tackling homelessness despite not having a duty to refer, the National Housing Federation, the membership organisation for housing associations in England, has encouraged all of its members to sign up to a voluntary commitment to refer to challenge the perception that “housing associations aren’t[...]a key part of the solution.”³⁷

However, these cooperative working relationships are not in place across the board, with several interviewees noting that because independent academies have less regular contact with local authorities, building cooperative relationships with these schools in particular could be difficult. Further, the absence of these agencies from the duty to refer may mean that they are not receiving necessary training on how and when to refer, as FOI responses from local authorities have shown training provided by authorities is typically only to those agencies with a statutory duty.

It is important to note that any extension of the duty to refer must be mindful to the fact that the legal responsibility for 16 and 17-year-olds at risk of homelessness lies with children’s services.³⁸ If schools are given a duty to refer to local housing authorities, there needs to be effective mechanisms in place to channel young people to the right department and ensure those under 18 are supported by children’s services and given a full assessment as per the Children’s Act.

Recommendation 4

Government should extend the duty to refer to a wider range of public bodies, such as schools, further education colleges, and the police, to reflect those that are well-placed to recognise the early warning signs of youth homelessness. Frontline services who sit outside this legal remit, such as GPs, should be encouraged to sign up to a voluntary “commitment to refer,” based on the model developed by the National Housing Federation.

³⁶ Local Government Association, *Duty to Refer: An Opportunity to Cooperate to Tackle Homelessness*, 13.

³⁷ National Housing Federation, ‘Commitment to Refer - Guidance for Housing Associations’, 26 September 2018.

³⁸ Shelter, *Responding to Youth Homelessness Following G v LB Southwark Judgment*.

1.4.2 Does there need to be a duty on other public bodies to prevent?

While the duty to refer represents a welcome step towards adopting a joined-up approach to homelessness prevention, there is a risk that the duty does not go far enough to ensure meaningful collaboration between public services.³⁹ In several interviews for this paper, local housing authorities, with whom the statutory duty to prevent and relieve homelessness sits, said they still feel like they are “carrying the can.” Interviewees have argued this is because current obligations on other public bodies fall short of a “duty to do something”, and there is therefore the risk that the duty to refer could lead to a greater number of one-way referrals while maintaining an assumption that homelessness “is someone else’s problem.”

This lack of collaboration has been exemplified by the criticism that some public bodies are treating the duty to refer as a “tick-box” exercise and passing young people over to local housing authorities. One charity worker even expressed concern that now the prevention role of some public authorities has been partly formalised through the duty to refer, they may have narrowed their approaches to homelessness prevention to only satisfy this legal minimum, whereas previously they may have taken a more proactive role.

Stronger requirements for other authorities were considered in the development of the HRA; its first draft featured a stronger “duty to cooperate”. However, these proposals were dropped and replaced by a duty to refer. Moreover, a proposed amendment to cooperate when a referral is made was rejected due to concerns that it would be “too onerous to administer.”⁴⁰ In reality, interviewees have argued that because the legislation was introduced as a Private Members’ bill, it lacked the necessary clout to introduce legal duties on a range of government departments, especially given the time pressure of an upcoming general election. Following the introduction of the HRA, there has been renewed support for introducing prevention duties on other public services, and MHCLG’s recent consultation asks respondents to examine how a duty to cooperate would work in practice.⁴¹

Considering what this statutory duty “to do something” would look like poses a number of challenges.⁴² In England, there has been a requirement for housing associations to cooperate with local authorities in the undertaking of homelessness duties since 1996, but this has not always led housing associations to consider the impact of their own policies on homelessness.⁴³ For example, there is evidence to suggest the increasing use of risk assessments by housing associations are restricting access to those with histories of homelessness.⁴⁴

Similarly, there is a duty to cooperate between local housing authorities, social service authorities, and housing associations in Wales. However, an independent evaluation of the legislation was inconclusive about its impact.⁴⁵ This highlights the important difference between a duty to cooperate and a duty on other public bodies to prevent. While the former continues to place the responsibility for homelessness prevention with local housing authorities, the latter would require other public bodies to consider the impact of their own policies on homelessness and be held legally accountable for this.

Introducing a generalised duty to prevent on other public bodies, however, is difficult given the challenges of formalising the vast number of ways organisations could potentially

39 Jacob, *Preventing Homelessness: It’s Everybody’s Business*, 8; Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 2019, sec. 2.2.

40 Local Government Association, *Duty to Refer: An Opportunity to Cooperate to Tackle Homelessness*, 7.

41 Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, sec. 4.6.

42 Ibid.

43 HM Government, *Housing Act 1996*, sec. 213.

44 Paul Hickman, Ben Pattison, and Jenny Preece, *The Impact of Welfare Reforms on Housing Associations* (UK Collaborative Centre for Housing Evidence, 2018), 54; Homeless Link, *Social Housing Green Paper A ‘New Deal’ for Social Housing: Submission from Homeless Link* (Homeless Link, 2018), 5.

45 A Ahmed et al., *Post-Implementation Evaluation of Part 2 of the Housing Act (Wales) 2014: Final Report* (Welsh Government, 2018).

cooperate to prevent homelessness.⁴⁶ Interviewees have also noted that the political appetite to introduce another significant change to the homelessness legislation is weak so soon after the HRA. A duty to prevent could instead sit outside the homelessness legislation and be embedded within the legislation of other relevant government departments, including DWP, the Department of Health and Social Care, the Department for Education, the Ministry of Justice, and the Home Office.⁴⁷ This would require different departments to examine their own policies to ensure they do not undermine homelessness prevention efforts and consider what actions they can take to actively prevent it.⁴⁸ Embedding these actions within the relevant legislation governing each department would make it clear that the prevention duty sits within the respective department and is not the responsibility of local housing authorities. For example, for hospitals and prisons this could mean a duty not to discharge into homelessness, while for schools and colleges this could mean introducing homelessness champions in specific schools. These new duties should focus on upstream prevention work before someone is imminently threatened with homelessness, to ensure that this legislation would sit alongside the duty to refer, which comes into effect 56 days before someone is threatened with homelessness.

Strong cross-departmental working, explored further in section 2.3.3, will be needed to push forward this process, and sufficient funding and reporting mechanisms will need to be carefully considered.⁴⁹ This work should be fronted by the Cabinet Office, which carries the necessary authority to ensure cross-government buy-in and could be supported by the Ministerial Rough Sleeping and Homelessness Reduction Taskforce, that has already been set up to ensure cross-government collaboration on the issue of rough sleeping.⁵⁰

Recommendation 5

The Cabinet Office in conjunction with the Department for Work and Pensions, the Department of Health and Social Care, the Department for Education, the Ministry of Justice, and the Home Office should produce guidance on what reasonable steps each department can take to prevent and relieve homelessness. These steps should be embedded within each department's own legislative and regulatory framework to ensure legal accountability.

⁴⁶ Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, sec. 4.6.

⁴⁷ Jacob, *Preventing Homelessness: It's Everybody's Business*.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Ibid.

2

Building on the Homelessness Reduction Act

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While the HRA represents a necessary step-change in homelessness legislation, it is only part of the solution. It is the minimum standard on which local authorities can build and develop innovative solutions to tackle youth homelessness. As this chapter shows, however, there is considerable variation in the approaches taken by local authorities, which can affect the quality of services delivered. Moreover, the effectiveness of a local authority's approach can only go so far to tackle youth homelessness; the availability of housing stock and welfare restrictions that adversely affect young people are at the heart of the issue. The initiatives taken by local authorities must be supported by national government.

2.1 A postcode lottery in service quality

Across the country, there is significant variation in the approach to, and quality of, youth homelessness services. The establishment of strong relationships with other public bodies and the strategies employed to prevent youth homelessness differ from authority to authority. Furthermore, the context in which local authorities are working, such as the numbers of young people at risk of homelessness, the housing stock available in the local area, and the funding provided through grants, varies across the country and can impact the ability of a local authority to focus on early intervention rather than crisis point prevention.

2.1.1 Variation in joint working

Establishing formal or informal joint working arrangements across different public services, such as co-location hubs, strategic forums, and data sharing agreements, can help to provide a wrap-around service that tends to the needs of a young person.⁵¹ A joint approach to youth homelessness prevention, which includes bodies such as housing authorities, children's services, schools, and mental health services among others, accepts the premise that youth homelessness is rarely just about housing, but can be because of various structural, interpersonal, and individual factors that make a young person vulnerable to homelessness.⁵²

Among local authorities, however, efforts to promote joint working vary. A minority of local authorities interviewed for this paper reported having longstanding and effective working relationships between different organisations. However, other authorities admitted the "need to do more" to promote joint working across services.

2.1.1.1 Joint protocols

For young people aged 16 and 17, the relationship between children's services and local housing authorities is essential for homelessness prevention. Yet, the strength of this relationship varies considerably across the country. After the 2009 Southwark Judgement, 16- and 17-year-olds were confirmed as "children" and therefore, under the 1989 Children's Act, were the primary responsibility of children's services.⁵³ The Judgement suggested that if a 16- or 17-year old is at risk of homelessness, it is "good practice" for an assessment of a young person's needs to be conducted by both housing and children's services.⁵⁴ In 2010, further guidance was published arguing that it is "essential" that the two services establish a joint protocol with mutually agreed objectives and processes.⁵⁵

51 St Basils, *Developing Positive Pathways to Adulthood: Supporting Young People on Their Journey to Economic Independence and Success through Housing Advice, Options and Homelessness Prevention*, 2015, 12; Centrepoint, *Preventing Youth Homelessness: What Works?*, 13; Schwan et al., *Preventing Youth Homelessness: An International Review of Evidence*, 27.

52 Suzanne Fitzpatrick, Glen Bramley, and Sarah Johnsen, 'Pathways into Multiple Exclusion Homelessness in Seven UK Cities', *Urban Studies* 50, no. 1 (January 2013): 151; St Basils, *Developing Positive Pathways to Adulthood: Supporting Young People on Their Journey to Economic Independence and Success through Housing Advice, Options and Homelessness Prevention*, 12; Anderson and Christian, 'Causes of Homelessness in the UK: A Dynamic Analysis', 110; Gaetz and Dej, *A New Direction: A Framework for Homelessness Prevention*, 17.

53 House of Lords, 'R (One the Application of G) (FC) (Appellant) v London Borough of Southwark (Respondents)' (2009).

54 Department for Communities and Local Government and Department for Education, *Prevention of Homelessness and Provision of Accommodation for 16 and 17 Year Old Young People Who May Be Homeless and/or Require Accommodation*, 2010, 13.

55 Ibid., 35.

Joint protocols, however, are not a legal obligation and, if adopted, do not always result in strong working relationships. More than half of the local authorities interviewed for this paper argued that the Judgement has had a positive effect, noting that the joint assessment helps the services to communicate, share information, and build personal connections. However, several other authorities argued that the relationship between the two services “could be better”, particularly in two-tier authorities where housing sits at district-level and children’s services at county-level.

Several local authorities also noted that during joint assessments, difficulties could arise as children’s services still considered a 16- or 17-year old at risk of homelessness to be the responsibility of the housing department – demonstrating a refusal to fulfil their statutory duties. In a number of interviews, interviewees also claimed that in certain instances, housing and children’s services disagreed as to whether a young person should be considered ‘looked after’ and therefore receive additional support from children’s services until they were 25.⁵⁶ Support provided by children’s services stops at 18 for young people not considered to be a care leaver with ‘looked-after status.’ Several interviewees argued that with existing pressures facing children’s services, there could be considerable disagreement over a young person’s status as a result. A survey of local housing authorities further demonstrates varying degrees of collaboration between housing and children’s services. 20 per cent considered there to be “very effective” cooperation between the two bodies and 46 per cent argued that there was “effective” cooperation. However, 7 per cent consider cooperation “ineffective” and another 7 per cent argued that it was “very ineffective.”⁵⁷

2.1.1.2 Forums

The use and effectiveness of homelessness forums, where different public bodies and voluntary services meet to discuss either strategic approaches to homelessness or individual cases, further demonstrates variance in approaches to youth homelessness prevention. Forums can be used to identify issues of concern, understand the pressures facing other services, and to share knowledge and good practice. Minutes from Crawley’s housing and homelessness forum in June 2018 demonstrate the benefits of this multi-agency approach, which included representatives from the voluntary sector, DWP, housing associations, utility providers, and the local housing authority. The forum identified mental health problems as an issue facing residents, offered reasons why this was the case and proposed joint solutions such as wrap-around support to tackle the situation going forward.⁵⁸

For other local authorities, however, the usefulness of homelessness forums is questionable. In MHCLG’s recent consultation, it acknowledges that although some forums are effective, others are limited to statutory agencies and only meet once or twice a year.⁵⁹ This viewpoint is corroborated by interviews for this paper, with several local housing authorities arguing that forums are often poorly attended, in part because of the number of meetings relating to various local needs, and fail to attract key decision-makers. Furthermore, as public-sector commissioning of third-sector companies has increased since 2010,⁶⁰ and the Public Services (Social Value) Act 2012 encouraged Voluntary, Community and Social Enterprises to compete for more public-sector contracts,⁶¹ competition between voluntary-sector providers has increased. Several of the interviewees involved in homelessness forums suggested that this can foster a non-cooperative culture among voluntary-sector organisations at these forums.

⁵⁶ HM Government, *Care Act 2014*, 2014.

⁵⁷ Homeless link, ‘Young & Homeless 2018’, 36.

⁵⁸ Crawley Housing and Homelessness Forum, *Crawley Housing and Homelessness Forum Minutes*, 2018.

⁵⁹ Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 11.

⁶⁰ *Seminar One: The Third Sector as a Public Service Provider*, ESCR TSRC Co-Centre Seminar Series 2012-13 (Third Sector Research Centre, 2012), 6.

⁶¹ Naomi Jones and Alice Yeo, *Community Business and the Social Value Act*, Research Institute Report (The Power to Change Trust, 2017), 2.

2.1.1.3 Local authority partnerships

Establishing partnerships with neighbouring local authorities can also help to tackle youth homelessness. Across London, partnerships between boroughs have been created to forge action plans and manage resources. The East London Housing Partnership, for example, includes eight boroughs and six support providers that are collaborating to help single homeless people access accommodation in the private rented sector.⁶²

The use of local authority partnerships, however, differs across the country and currently, only three of the five sub-regional London partnerships are in operation. Several interviewees argued that it was often difficult to get different authorities to agree to a “shared mission” with clear outcomes, such as focusing on mental health or substance abuse, and to share resources equally to ensure certain authorities are not overburdened. In a similar fashion to homelessness forums, a successful cross-authority partnership requires buy-in from the various authorities and a clear understanding of its aims based on local need. This can be particularly difficult for two-tier authorities working with other districts and county councils, as the number of relevant partners can grow significantly.

Statutory obligations and limited resources can affect the ability of local authorities to work together. If a young person in need of housing does not have a local connection, such as living, working or having family in the area, the local authority may refer the relief and housing duty to another authority where the young person has a connection. According to MHCLG’s Homelessness Code of Guidance, however, if that person is at risk of domestic abuse or violence, that person should not be referred.⁶³ Nonetheless, several interviewees described how in a minority of instances this was not the case. Another interviewee suggested that for young people who have been involved in gangs within a certain location, it is important to take these issues into account when considering where is best to house them. In addition, several interviewees argued that in many cases, both authorities will conduct an initial assessment of need – as is obligated under the HRA – but this information is not passed between authorities and can differ in detail from one authority to the next.

2.1.1.4 Data sharing

Sharing information across services can improve a local authority’s understanding of young people’s needs and shape interventions accordingly. However, the effective use of data varies across the country. In North Yorkshire County Council, there is an information sharing protocol that aims to improve local services and detect possible safeguarding issues.⁶⁴ Although not solely related to youth homelessness, homelessness support and prevention is a key element of the protocol, which is supported by the police, fire services, housing support and health services among others. In London, the Combined Homelessness and Information Network (CHAIN), a multi-agency database, allows several commissioned outreach teams and support services to share recorded information on rough sleepers in London.⁶⁵ This can include basic identifying information, support needs, circumstances prior to rough sleeping and contact with outreach workers.⁶⁶

During interviews with local authorities it was evident that data sharing with other public services, when there is a clear individual or public benefit, was not widespread. Several interviewees argued that concerns regarding consent, privacy, and security when accessing personal data were perceived barriers to data sharing. It was clear that the General Data Protection Regulation had led to a concern among frontline staff that

62 East London Housing Partnership, ‘East London Housing Partnership’, Webpage, East London Housing Partnership, 2018.

63 Ministry of Housing, Communities and Local Government, ‘Chapter 10: Local Connection and Referrals to Another Housing Authority’, in *Homelessness Code of Guidance for Local Authorities*, 2018.

64 North Yorkshire County Council, *Multi-Agency Overarching Information Sharing Protocol*, 2016.

65 Greater London Authority, ‘Rough Sleeping in London (CHAIN Reports)’, Webpage, London Datastore, 2019; Charlotte Snelling, *Right to Home? Rethinking Homelessness in Rural Communities* (Institute for Public Policy Research, 2017), 15.

66 ‘CHAIN - Combined Homelessness and Information Network’, Webpage, St Mungo’s, 2019.

sharing personal data across services could affect their compliance, demonstrating a lack of understanding of the legislation. It is essential, therefore, that frontline staff feel confident to adopt the spirit of the legislation, which promotes individual rights and effective privacy management, whilst not using it as a reason to stop sharing data when appropriate.

Technical barriers were also cited as an obstacle to effective data sharing. Several interviewees argued that IT systems used by different local services are often not interoperable which means that it can be technically difficult to share relevant information. One local authority said that within their co-location hub, each service had a separate IT system, all of which were unable to exchange information securely and efficiently. As a result, it was easier for the frontline staff to pass over information in person, rather than through a specific IT system. For authorities without a co-location hub, however, this could prove to be a significant barrier to effective joint working. To improve interoperability and joint working, IT systems that are procured must adopt open standards that enable data to be accessed securely and efficiently across services.⁶⁷

2.1.2 Variation in local leadership

To create and implement effective strategies to prevent youth homelessness, committed leadership is required. MHCLG have recognised the importance of “strong local leadership” and more informal working relations at a local level for successful homelessness prevention.⁶⁸ The diligence of individuals, not simply the statutory or non-statutory duties they have, can go a long way to explaining the success of an initiative. For example, most local authorities interviewed for this paper argued that the ability to forge strong relationships with other public services, such as children’s services, local prisons, and mental health support, was often a result of personal relationships between individuals. Several interviewees argued that when specific individuals who had built up strong relationships left their roles within a local authority, communication could break down or become considerably slower when working with other services.

Local initiative was also a factor in the effectiveness of the relationship between local and central government. Almost half of the local authorities interviewed acknowledged that they had benefitted from the support of MHCLG advisers. One interviewee argued that since the HRA, this relationship “had improved.” However, it was clear that where the relationship with central government was working well, it was a result of local authorities being proactive and seeking support from MHCLG at an early stage. Indeed, a number of local authorities acknowledged that although help and advice from MHCLG was readily available, it required local authorities to take the initiative.

2.1.3 Variation in homelessness strategies

Strategies to prevent youth homelessness within a local authority, in addition to strategies created to support a young person at risk of homelessness, also vary from authority to authority. Differences in strategies can be in the amount of detail provided and how far strategies accurately reflect the work done by local authorities. As this section shows, a detailed prevention strategy that sets out how to tackle homelessness across a local authority does not necessarily correlate to good working practices. However, a detailed personalised plan at case-level, which reflects the specific needs of a young person, should contain a consistent amount of detail across the country. Currently, a variation in standards in these individual strategies is further evidence of a postcode lottery in the quality of service provision.

⁶⁷ Sarah Timmis, Luke Heselwood, and Eleonora Harwich, *Sharing the Benefits: How to Use Data Effectively in the Public Sector* (Reform, 2018), 22.

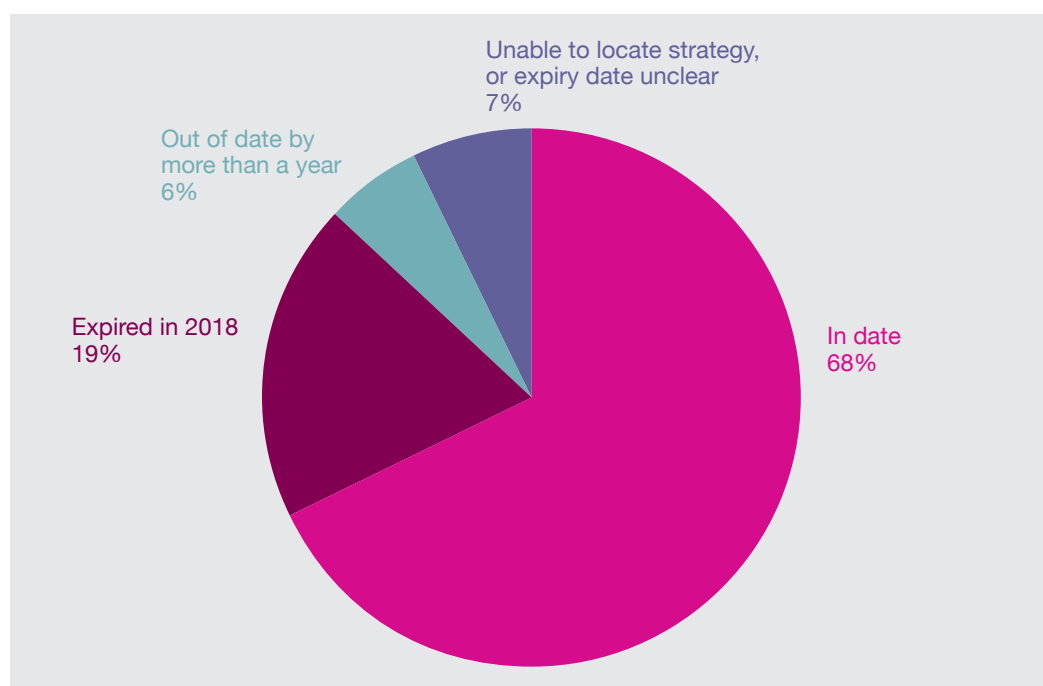
⁶⁸ Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 19.

2.1.3.1 Homelessness prevention strategies

The Homelessness Act 2002 introduced a statutory responsibility for every local authority to create a strategy to address homelessness that must be reviewed at least once every five years.⁶⁹ To support local authorities, MHCLG published *The Homelessness Code of Guidance* to offer advice on what to include in a strategy, such as identifying the causes of homelessness and weighing of resources between prevention and relief.⁷⁰ However, it does not guarantee the quality of the strategies that local authorities produce.

Although the first round of strategies submitted to MHCLG (then the Department for Communities and Local Government) were evaluated centrally, they have not been monitored since.⁷¹ As a result, the content of a strategy is not necessarily indicative of what is being done to prevent homelessness. Many strategies contain action plans, which can provide some accountability at a local level, but their effectiveness will depend on the diligence of the local authority.⁷² To rectify this, in the *Rough Sleeping Strategy* MHCLG committed to ensuring that all authorities update their strategies and submit them to the Ministry, and to introducing measures to scrutinise action plans.⁷³

Figure 7: The proportion of homelessness strategies published online that are out of date



Source: *Reform* analysis. These figures were calculated in November 2018 (see Appendix for methodology).

⁶⁹ HM Government, *Homelessness Act 2002*, secs 1(1)[a-b], (4).

⁷⁰ Ministry of Housing, Communities and Local Government, *Homelessness Code of Guidance for Local Authorities*, 2.27-2.29.

⁷¹ National Audit Office, *Homelessness*, 2017, 9.

⁷² Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 16.

⁷³ Ministry of Housing, Communities & Local Government, *Rough Sleeping Strategy*, 30.

The strategies local authorities produce also vary considerably in detail.⁷⁴ Many are thorough and well considered, incorporating MHCLG guidance on prevention. For instance, *The Greater Norwich Homelessness Prevention Strategy* identifies an increase in youth homelessness, and acknowledges that more young people may be hidden homeless.⁷⁵ It states the need to identify young people threatened with homelessness at an early stage and outlines several measures being taken, including the creation of a post for a housing options adviser embedded in children's services to provide good outcomes for care leavers, and the provision of mediation services by housing associations.⁷⁶ By contrast other strategies are less well considered, and do not offer recommendations related to young people. One strategy identifies parental eviction – which largely affects young people – as the leading cause of homelessness in the district it was written for.⁷⁷ Despite this, it makes no reference to homelessness prevention for young people, and only six pages of the 36-page strategy cover homelessness prevention.⁷⁸ Where young people are identified as a group that require support, homelessness strategies must adequately reflect this – with clear policies focused on addressing their specific needs.

Interviewees for this paper expressed mixed views about the purpose and usefulness of homelessness strategies for prevention work. While some authorities described their strategies as “living documents”, others said they were a “box-ticking exercise” that did not inform frontline working practice. This is supported by the fact that, as of November 2018, several of the strategies published online were out of date (see Appendix for more details). Of those that expired in 2018, some may now have been renewed. MHCLG guidance states that strategies should take into account “any planned legislation or local policy changes that are likely to impact on levels of homelessness for particular groups in the district.”⁷⁹ The introduction of the HRA and recent rises in all forms of homelessness make it likely that many strategies are now unsuitable.

Recommendation 6

The Ministry of Housing, Communities and Local Government should update their guidance for local authorities with advice on how to prevent youth homelessness. The Ministry should also ensure that homelessness prevention strategies, which are created by local authorities, include a section specifically related to the needs of young people.

⁷⁴ Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 16.

⁷⁵ South Norfolk Council, Broadland District Council, and Norwich City Council, *Greater Norwich Homelessness Strategy 2015-2020*, 2015, 19.

⁷⁶ *Ibid.*, 19–20.

⁷⁷ North Hertfordshire District Council, *North Hertfordshire Housing and Homelessness Strategy 2013-2018*, 2013, 31.

⁷⁸ *Ibid.*, 30–36.

⁷⁹ Ministry of Housing, Communities and Local Government, *Homelessness Code of Guidance for Local Authorities*, sec. 2.18.

2.1.3.2 Personalised housing plans

The housing strategies devised to meet a young person's needs also demonstrate considerable variation in quality across local authorities. Under the HRA, local housing authorities are required to produce a personalised housing plan (PHP) for anyone imminently threatened with homelessness, based on a consideration of the circumstances leading an individual to become homeless and their ongoing support needs.⁸⁰ In theory, this means that local authorities can offer clear and actionable advice based on the specific needs of an individual at risk of homelessness, such as how to access family mediation services or employment support. However, interviewees for this paper, including several local authorities, noted the “huge variation” in the quality and detail of PHPs produced so far, with not all plans being well thought through or realistic for the individual. In one extreme example, a PHP was reported to have been written on the “back of a napkin” with minimal detail. Although not the norm, this again highlights a significant variation in quality across local authorities.

Recommendation 7

A young person's personalised housing plan should include, at a minimum, options for mediation or other accommodation and clear advice on benefits, employment, and mental health support. Anonymised personalised housing plans must be available for audit from the Ministry of Housing, Communities and Local Government to ensure minimum standards are being adhered to.

2.1.4 Variation in early intervention approaches

Across local authorities, there is a lack of consistency in the use and effectiveness of early intervention approaches such as family mediation or school-based programmes. For most of the local authorities interviewed for this paper, although they recognised the benefits of early intervention, resources are still geared towards crisis point. Where early intervention approaches are used, there is considerable variation in who delivers these services, when they are delivered, and how outcomes of success are measured which ultimately impact the effectiveness of these interventions.

2.1.4.1 Whole-family approaches

Given that youth homelessness can often be triggered by problems within the family home, interventions that work to support whole families, not just the young person, are an important part of youth homelessness prevention.⁸¹ However, the availability and quality of this support is not consistent.⁸² Currently, 74 per cent of local authorities offer family mediation services for young people at risk of homelessness.⁸³

The approaches taken by authorities range from formal mediation programmes conducted by trained mediators, to housing officers “calling up mum or dad” to informally resolve the situation. While informal mediation is a valid form of prevention, especially given the risks of harm associated with living in temporary accommodation,⁸⁴ research also shows returning to the family home may not always be the best option for a young person where there are safeguarding concerns. What is important is that return home is not the only outcome measured to judge the effectiveness of mediation, but that “softer” outcomes such as improved relationships and increased life skills are also taken into account.⁸⁵ Indeed, without additional support, quick fixes can merely push the problem away in the short-term.

⁸⁰ Ibid., chap. 11.

⁸¹ Centrepoin, *Preventing Youth Homelessness: What Works?*, 15; Gill, *Families under Pressure: Preventing Family Breakdown and Youth Homelessness*, 16.

⁸² Gill, *Families under Pressure: Preventing Family Breakdown and Youth Homelessness*; Watts, Johnsen, and Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation*.

⁸³ Gill, *Families under Pressure: Preventing Family Breakdown and Youth Homelessness*, 18.

⁸⁴ McCoy, *Danger Zones and Stepping Stones: Phase Two*.

⁸⁵ Centrepoin, *Preventing Youth Homelessness: What Works?*, 18.

Additionally, mediation has been shown to be most effective when offered as early as possible, as relationships are more difficult to repair once crisis point has been reached. In one study conducted in 2009, only 14 per cent of homeless young people thought mediation would be useful once they had become homeless.⁸⁶ For this reason, children's services may be better suited to provide mediation services to families under pressure than local housing authorities. One interviewee also noted that children's services were "a more powerful brand" than housing services when it came to encouraging parents to engage with mediation.

2.1.4.2 School-based interventions

School-based interventions, which typically aim to increase young people's awareness of the realities of homelessness, can act as a deterrent, by giving young people a realistic impression of what living independently is like on a limited budget.⁸⁷ However, while schools-based interventions are being used by a number of local authorities and charities, provision is patchy, and approaches vary significantly.⁸⁸

The reasons for this are two-fold. First, the evidence base for this form of prevention is weak and more research is needed to understand whether fewer, more intensive interventions are more effective than universal, light-touch programmes; at what age young people should be targeted; and which methods of intervention are most effective.⁸⁹ Reflecting the challenges of attributing long-term social outcomes to a specific policy intervention, to date, local authorities and charities have instead evaluated individual programmes using short-term qualitative indicators, such as improved understanding of homelessness.⁹⁰

Second, as noted in other studies and confirmed by interviews for this paper, getting access to schools to deliver such interventions can be a challenge.⁹¹ Because of the pressure on schools to deliver compulsory components of the curriculum, persuading schools of the importance of this extra-curricular support and finding time in the school timetable to deliver a programme can be difficult. Where local housing authorities have been able to gain access, this has often been due to established, positive relationships between the local council and specific schools rather than standard practice.⁹²

2.2 Tackling the structural issues

The efforts made by local authorities to tackle youth homelessness, in addition to the impact of the HRA, will never be fully successful unless the level of available housing stock and welfare restrictions facing young people are addressed. The majority of local authorities interviewed for this paper acknowledged that these were the main barriers to effective homelessness prevention. There was considerable agreement that regardless of how well different public bodies or authorities work together, or the innovative approaches taken, without tackling these issues they will always struggle to eradicate youth homelessness.

⁸⁶ Jennifer Monfort, *Family Life: The Significance of Family to Homeless Young People*. (Centrepoint, 2009), 26.

⁸⁷ Watts, Johnsen, and Sosenko, *Youth Homelessness in the UK: A Review for the OVO Foundation*, 83.

⁸⁸ *Ibid.*, 84.

⁸⁹ Centrepoint, *Preventing Youth Homelessness: What Works?*, 20.

⁹⁰ St Basils, *STaMP: Schools Training and Mentoring Project*, 2014, 4; Centrepoint, *Preventing Youth Homelessness: What Works?*, 20.

⁹¹ Homeless link, 'Young & Homeless 2018'.

⁹² *Reform Interviews*.

2.2.1 Housing options

For many local authorities, there is a lack of suitable housing options available for young people. It can be difficult for young people to access both the private rented sector and social housing.⁹³ High up-front costs for a private tenancy, rising rent costs and a shortage of affordable shared accommodation are all barriers for young people hoping to enter the private rented sector. Furthermore, private landlords are often reluctant to offer tenancies to people on benefits, in part because of mortgage and insurance conditions on their properties.⁹⁴

Social housing stock also represents a serious challenge to what local authorities can offer young people at risk of homelessness. Since 2012, there has been a decline in social rented stock held by both local authorities and housing associations, in addition to a decline in new social housing.⁹⁵ There has been a 176 per cent decrease in dwellings owned by local authorities in England between 1997 and 2018.⁹⁶ There are also 1.2 million households currently on the waiting list for social housing.⁹⁷

The failure to build enough social housing, in addition to losses of current stock, has made it increasingly difficult for young people to access a social tenancy.⁹⁸ Figures also show that there has been a significant decline in real-term investment and public grant funding for social housing, yet spending on housing benefit has risen from £9 billion in 1991-1992 to £21 billion now.⁹⁹ Lower levels of grant funding has meant that other avenues of funding, such as borrowing, have grown – reinforced by the restrictions on local authorities borrowing being lifted in 2018.¹⁰⁰ However, as Shelter have argued, borrowing costs are often paid for against existing social homes and rents, which can make it difficult to keep rent at a low level.¹⁰¹

Access to supported and temporary accommodation options, such as supported accommodation or supported lodgings, can also be difficult. According to Homeless Link, 57 per cent of young people surveyed found it difficult to find long-term supported accommodation.¹⁰² Furthermore, because of limited supply, available supported accommodation can be unsuitable for the needs of a young person. If housed with people from different age groups with complex needs, for example, it can become an unsafe environment.¹⁰³ According to Centrepont, one in five young people that accessed their services were ready to move on from temporary or unsuitable supported accommodation, but were unable to do so because of a lack of other options.¹⁰⁴

2.2.2 Income and welfare restrictions

Access to housing can also be affected by a young person's income and lower benefit rates. In a survey conducted by Centrepont, more than eight in ten housing associations viewed young peoples' incomes as an issue affecting the ability to afford housing.¹⁰⁵ Lower minimum wage rates for young people – while they accrue the same costs of living – is a barrier to accessing housing.¹⁰⁶ Social housing at an 'affordable rent' rate is defined

93 Harding, *Ready to Move on: Barriers to Homeless Young People Accessing Longer-Term Accommodation*, 4.

94 *Ibid.*, 25.

95 Mark Stephens et al., *2018 UK Housing Review: Autumn Briefing Paper* (Chartered Institute of Housing and Heriot Watt University, 2018), 16.

96 Ministry of Housing, Communities and Local Government, *Local Authority Housing Statistics: Year Ending March 2018, England*, 2019, 3.

97 Shelter's commission on the future of social housing, *Building for Our Future: A Vision for Social Housing*, 37.

98 Ministry of Housing, Communities and Local Government, *Live Table 1000: Additional Affordable Homes Provided by Type of Scheme, Completions, England*, 2018.

99 Shelter's commission on the future of social housing, *Building for Our Future: A Vision for Social Housing*, 96–97.

100 *Ibid.*, 97.

101 *Ibid.*

102 Homeless link, 'Young & Homeless 2018', 40.

103 Sarah McCoy and Becky Hug, *Danger Zones and Stepping Stones: Young People's Experiences of Hidden Homelessness* (Depaul, 2016).

104 Harding, *Ready to Move on: Barriers to Homeless Young People Accessing Longer-Term Accommodation*, 6.

105 *Ibid.*, 17.

106 *Ibid.*

as anything up to 80 per cent of the local market rate.¹⁰⁷ There are more social housing dwellings being built at an ‘affordable rent’ rate, rather than at a ‘social rent’ rate, which is usually 30-40 per cent below market rate.¹⁰⁸

Welfare restrictions for young people can make accessing housing difficult. According to the National Audit Office (NAO), welfare changes, such as the Local Housing Allowance freeze – alongside the affordability of housing – have contributed to the growth in all forms of homelessness.¹⁰⁹ Young people, however, are particularly affected. For single people under 35, they are often only entitled to a Local Housing Allowance at a Shared Accommodation Rate, which is the amount considered adequate to share a room at the lower level of the local private rented sector.¹¹⁰ There was an overwhelming consensus among interviewees that low benefit rates for young people do not bare relation to the cost of living and run counter to the Government’s commitment to prevent homelessness.

2.3 A national youth homelessness agenda

To respond to local circumstances, it is important that local authorities have the power to tackle youth homelessness in their specific area. However, local authorities also require support from national government, beyond legislation, to spread best practice. In 2017, the NAO said that MHCLG had adopted a “light touch” approach to working with local authorities.¹¹¹ This viewpoint was supported by several interviewees, who argued that the Government’s localism agenda had pushed the responsibility for tackling youth homelessness firmly onto local authorities. Yet, at same time, local areas continue to face significant budget restraints, with a 28.6 per cent real-terms reduction in local authorities’ spending power from 2010-11 to 2017-18.¹¹² A stronger national presence, building on the changes introduced under the HRA, would help to complement local efforts to tackle youth homelessness.

2.3.1 Understanding young people’s needs

To better understand the needs of young people, effective data collection and analysis is needed to inform policy decisions at a local and national level. Data collection is an area where MHCLG takes a more direct role through the Homelessness Case Level Information Collection (H-CLIC). The Ministry has said that good-quality data “is essential for developing strategies, monitoring progress against action plans, designing service provision and intervention[...]and evaluating what does and does not work.”¹¹³

H-CLIC, introduced with the HRA, records local authorities’ statutory homelessness actions and replaces the former data return, known as P1E, which was no longer suitable due to the new duties.¹¹⁴ Prior to the HRA, local authorities were only obligated to collect data on statutory youth homelessness, which is an unsuitable measure to capture the scale of the problem.¹¹⁵ Some local authorities were collecting no further local-level data on youth homelessness. H-CLIC captures more detailed information such as a person’s employment and benefit status, their support needs, such as for mental health or substance misuse issues, and information about the people in the household of the main applicant.¹¹⁶

¹⁰⁷ Ministry of Housing, Communities and Local Government, ‘Definitions of General Housing Terms’, Guidance, GOV.UK, 14 November 2012.

¹⁰⁸ The Chartered Institute of Housing, ‘More than 165,000 Homes for Social Rent Lost in Just Six Years, New Analysis Reveals’, News Release, The Chartered Institute of Housing, 6 February 2019, 165; Ministry of Housing, Communities and Local Government, *Live Table 1000: Additional Affordable Homes Provided by Type of Scheme, Completions, England*, 100.

¹⁰⁹ National Audit Office, *Homelessness*, 21.

¹¹⁰ Harding, *Ready to Move on: Barriers to Homeless Young People Accessing Longer-Term Accommodation*, 20.

¹¹¹ National Audit Office, *Homelessness*, 36.

¹¹² National Audit Office, *Financial Sustainability of Local Authorities 2018*, 2018, 4.

¹¹³ Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*, 19.

¹¹⁴ Ministry of Housing, Communities and Local Government, *H-CLIC Frequently Asked Questions*, 2018, 6.

¹¹⁵ Centrepont, *More than a Number: The Scale of Youth Homelessness in the UK*, 2018, 16.

¹¹⁶ Ministry of Housing, Communities and Local Government, *H-CLIC - For the Monitoring of the Homelessness Reduction Act 2018 - Guidance for the Completion and Return of H-CLIC Data*, 2017, 6.

Most of the local authorities interviewed complained that the detail required for H-CLIC and the potential for errors in the data that would delay the submission had made the process more “onerous” than before, and this had created a new administrative burden.¹¹⁷ It was generally acknowledged, though, that errors with H-CLIC entry were a “teething problem”, and that in the long-term better data collection would allow for more meaningful analysis. With the new insights that H-CLIC can enable into the prevalence and characteristics of youth homelessness in a local area, local authorities must now make use of the data that is available to them to create appropriate, targeted interventions.

2.3.2 Digital support

To complement prevention work undertaken by local authorities, a national digital youth homelessness service offering advice and support could help to alleviate resource pressures facing local services and offer another avenue of provision for young people. This service would allow 24/7 access to support young people – a significant difference from the delivery of face-to-face services.

Digital services, such as online one-to-one chats, crisis messenger services and group discussion boards can help to overcome physical barriers to young people accessing a range of services. In rural areas, for example, poor transport links and distances between services are a challenge to service provision and joint working.¹¹⁸ Furthermore, as homelessness in these areas may be a small-scale problem in comparison to more urban areas, it can prove more costly per service user to have a wrap-around service or to co-locate.¹¹⁹

Through digital mediums, it can also be easier to reach young people at risk of homelessness. Young people are often reluctant to visit their local authority for statutory assistance and therefore using technology to access advice and support could appeal to them.¹²⁰ A survey of more than 1,000 young people found that they are comfortable and regular users of technology, with 65 per cent of the sample reporting that they use their phone if they need to know something urgently, and therefore it is often one of the most effective methods to pass on advice and support.¹²¹ Furthermore, a study examining Kooth, an online counselling service for young people with mental health problems, found that online forums provide young people with both informational and emotional support.¹²² Similarly, another evaluation of Kooth by the Education Policy Institute found that young people were often drawn to the service because of the anonymity, confidentiality and convenience of the digital support.¹²³

117 Amber Valley Borough Council, *Briefing Note on Quarter 1 of the Housing Solutions Service*, 2018, 3; Solihull Metropolitan Borough Council, *Appendix B: Information on Proposed Recruitment from Solihull Community Housing*, 2017, 2.

118 Snelling, *Right to Home? Rethinking Homelessness in Rural Communities*, 20–22.

119 Ibid.

120 Rita Diaz, *Young People and Homelessness* (Shelter, 2005), 7.

121 ‘Insights from Mobile Support Research’, Webpage, The Mix, 7 October 2013.

122 Julie Prescott, Terry Hanley, and Katalin Ujhelyi, ‘Peer Communication in Online Mental Health Forums for Young People: Directional and Nondirectional Support’, *JMIR Mental Health* 4, no. 3 (2017).

123 Emily Frith, *Online Mental Health Support for Young People* (Education Policy Institute, 2017), 10.

The use of digital services, however, should not act as a replacement to face-to-face services or co-location hubs, but should be a further supplement to existing services. For certain young people, digital services will be unable to meet their needs and, as argued by the Carnegie Trust, digital exclusion is still a significant challenge for many young people who would not have the basic digital skills to access services online.¹²⁴

A national digital youth homelessness service, supported by MHCLG, could follow a similar model to that provided by The Mix, a country-wide online service for people under 25, which provides digital support for the various needs a young person may have.¹²⁵ Among its numerous services, young people can call a helpline, use an online chat or 24-hour messenger service, or visit discussion boards to share experiences. The service provides a digital version of a multi-agency approach by providing apps and tools for tackling stress, learning about relationships and advice on living alone.

Recommendation 8

A digital national youth homelessness service, to be available 24/7, should be established to provide advice and support to young people through online one-to-one chats, crisis messenger services, and monitored discussion boards.

2.3.3 Cross-departmental working

An effective cross-departmental approach is needed to tackle all forms of homelessness.¹²⁶ At both a national and local level, there must be a shared vision of how to make homelessness prevention a reality, rather than an ideal.¹²⁷ DWP, the Ministry of Justice, Department of Health and Social Care, the Home Office, and the Department for Education all have a role to prevent homelessness which should be underpinned by legal duties.¹²⁸ Similarly, in several reports attempting to address the barriers to youth homelessness prevention, a cross-government approach is regularly cited as an important step needed to tackle the various causes of homelessness.¹²⁹

However, youth homelessness remains a peripheral issue for departments outside of MHCLG.¹³⁰ Indeed, steps such as the creation of Ministerial Working Group on Homelessness that brought together eight government departments that were to meet quarterly to tackle the various causes of homelessness have not worked. Between May 2015 and the end of March 2017, the Ministerial Working Group only met three times.¹³¹ Although the recent consultation from MHCLG acknowledges the importance of joint working at a national level, the focus of the questions posed in the report are aimed at joint working at a local level.¹³²

¹²⁴ Gina Wilson and Anna Grant, *A Digital World for All? Findings from a Programme of Digital Inclusion for Vulnerable Young People across the UK* (Carnegie UK Trust, 2017), 2.

¹²⁵ The Mix, 'The Mix: Essential Support for under 25s', Webpage, The Mix, 2019.

¹²⁶ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 15; Jacob, *Preventing Homelessness: It's Everybody's Business*.

¹²⁷ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 15.

¹²⁸ Jacob, *Preventing Homelessness: It's Everybody's Business*, 18–19.

¹²⁹ Centrepont, *Preventing Youth Homelessness: What Works?*, 14; National Audit Office, *Homelessness*, 9; Jonathan Rallings and Lisa Payne, *The Case for Early Support* (Barnardo's, 2016), 20.

¹³⁰ Jacob, *Preventing Homelessness: It's Everybody's Business*, 14.

¹³¹ National Audit Office, *Homelessness*, 37.

¹³² Ministry of Housing, Communities and Local Government, *Tackling Homelessness Together*.

Without a cross-government approach to homelessness, it is difficult to create effective and complementary policies across departments. As previously mentioned, certain policies from DWP, such as the Local Housing Allowance being capped at a Shared Accommodation Rate for under-35s, have been noted to contribute to the growth of youth homelessness.¹³³ Several local authorities interviewed for this paper argued that such policies can undermine the efforts from MHCLG to improve homelessness prevention.

Furthermore, as departmental funding, budgets and initiatives are relatively separate, it can be difficult to align policies across government to promote joint working. In addition to a shared vision of how to prevent youth homelessness that sets out the roles of relevant departments, there must be a synergy between policies and funding specifically focused on youth homelessness prevention. This could follow a similar framework to the Rough Sleeping Strategy, which has given different departments specific responsibilities and earmarked funding from each of them.¹³⁴

Recommendation 9

Based on a review of reasonable steps that departments could take to prevent youth homelessness, a portion of funding from the Ministry of Housing, Communities and Local Government, the Department for Work and Pensions, the Department of Health and Social Care, the Department for Education, the Ministry of Justice, and the Home Office should be pooled and ringfenced to ensure that responsibility for tackling youth homelessness across government is shared.

¹³³ National Audit Office, *Homelessness*, 7; Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 47; *The Homelessness Reduction Act: Will It Work for Young People?*, 6.

¹³⁴ Ministry of Housing, Communities and Local Government, *Rough Sleeping Strategy*, 2018.

3

Tackling short-termism

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Preventing youth homelessness requires local and national government to reject short-term thinking, looking beyond the immediate challenge of relieving youth homelessness to create targeted services that can *prevent* homelessness.¹³⁵ Although the HRA is intended to shift focus to prevention, the immediate challenge of relieving homelessness remains considerable. The NAO has shown that between 2010/2011 and 2015/2016, spending on temporary accommodation increased by 39 per cent, and accounted for the largest portion of local authority spending on homelessness services.¹³⁶ This is concerning, as demand for ‘intensive and urgent’ support may divert resources away from services that deliver interventions to prevent homelessness at an earlier stage.¹³⁷ In order to plan for prevention, local authorities must be financed in a way that supports long-term planning.¹³⁸

3.1 Funding constraints

Local authority funding reductions are impacting homelessness services. St Mungo's reports that between 2013/14 and 2017/18 there was a 20 per cent reduction in funding for floating support services for homelessness, which offer flexible support for vulnerable people to live independently in their own home, and an 18 per cent reduction in funding for floating support for young people.¹³⁹ Further, in 2017, the NAO found that there had been a 21 per cent real-terms reduction in spending on housing services to prevent homelessness since 2010.¹⁴⁰ Simultaneously, spending on temporary accommodation to relieve homelessness has increased, which suggests that more resources are being focused on relief than on prevention.¹⁴¹

The effects of funding reductions and insecure funding streams can be seen in the decline of the Supporting People programme, which was a major source of funding for homelessness services through the 2000s.¹⁴² This ringfenced grant was created in 2003 to fund accommodation support for vulnerable people. According to the former Communities and Local Government Committee, the programme was “instrumental in supporting the needs of some of the most vulnerable and socially excluded members of society” and delivered estimated savings of £3.4 billion for £1.6 billion of investment per annum.¹⁴³ In 2009 the ringfence was removed,¹⁴⁴ and between 2010/11 and 2017/18 spending on the grant fell by 59 per cent in real terms.¹⁴⁵ The decline of Supporting People has had wide-ranging effects on local authorities’ homelessness services, including the loss of non-statutory services, poor staff retention, and lower-quality performance monitoring.¹⁴⁶

The HRA is supposed to shift resources and focus to prevention, but funding constraints make it difficult to accomplish this. Central government has allocated local authorities £72 million in new burdens funding for three years to reflect the increased costs of carrying out new duties required by the HRA.¹⁴⁷ It has been estimated, however, that the new duties will cost London boroughs alone £77 million every year.¹⁴⁸ According to Centrepoin's projections, over half of local authorities have not been sufficiently resourced to increase prevention and relief for young people presenting as homeless since the HRA was

¹³⁵ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 124.

¹³⁶ National Audit Office, *Homelessness*, 24.

¹³⁷ Rallings and Payne, *The Case for Early Support*, 3.

¹³⁸ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 26; Audit Commission, *Supporting People*, 2005, 43.

¹³⁹ St Mungos, *Home for Good: The Role of Floating Support Services in Ending Rough Sleeping*, 2018, 23.

¹⁴⁰ National Audit Office, *Homelessness*, 8.

¹⁴¹ *Ibid.*

¹⁴² *Ibid.*, 28.

¹⁴³ House of Commons Communities and Local Government Committee, *The Supported People Programme: Thirteenth Report of Session 2008-09, Volume 1*, HC 649-1 (London: Stationery Office, 2009), 3.

¹⁴⁴ Homeless Link, *Who Is Supporting People Now?*, 2013, 6.

¹⁴⁵ National Audit Office, *Homelessness*, 28.

¹⁴⁶ Homeless Link, *Who Is Supporting People Now?*

¹⁴⁷ Lord Bourne of Aberystwyth, ‘Homelessness: Written Statement’ (HLWS176, 16 October 2017).

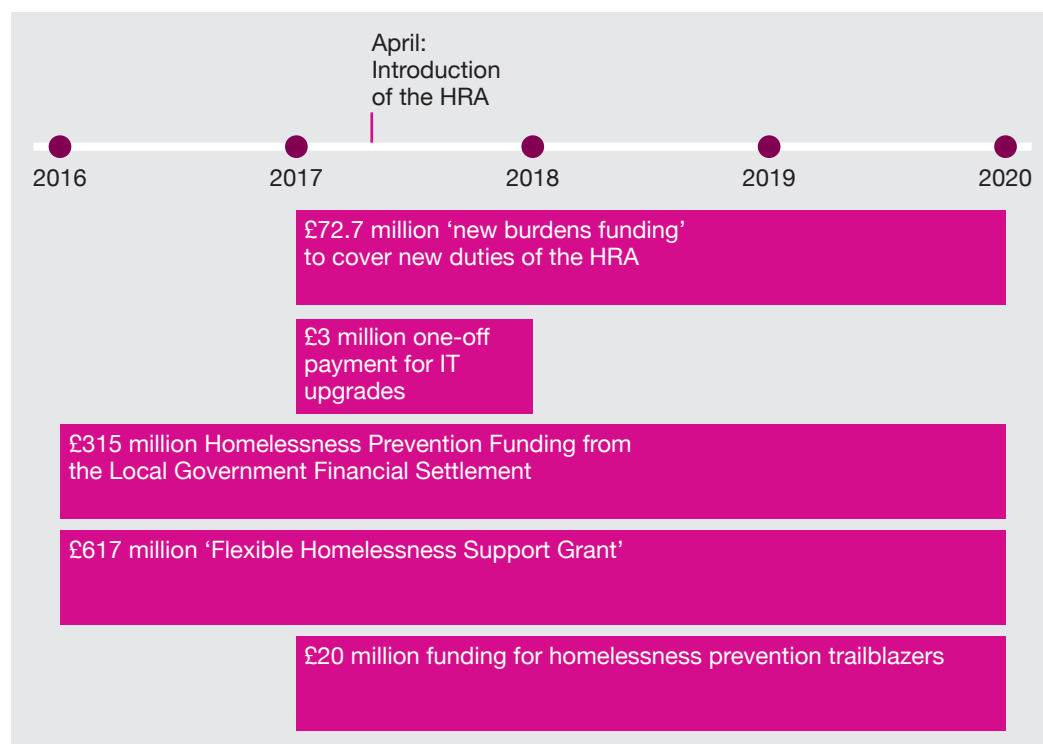
¹⁴⁸ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 103.

introduced.¹⁴⁹ These circumstances make it difficult for local authorities to realise the vision of the HRA, and several interviewees reported that they felt like they were still “firefighting” to relieve homelessness. It is important that funding allocated for homelessness prevention can support and sustain transformation for the long term.

3.2 Funding cycles

Short-term funding cycles for homelessness services are impacting the ability of local authorities to deliver youth homelessness services. Indeed, the majority of local authorities interviewed for this paper felt that current funding cycles hindered them in developing longer-term strategies for tackling the root causes of homelessness in their areas. As seen in Figure 8, homelessness prevention is a visible line of funding in the local government financial settlement. Funding from central government comes from a variety of grants, but these are only guaranteed for short periods of time.

Figure 8: Funding for local authorities to deliver homelessness prevention services



Source: Ministry of Housing, Communities and Local Government, 'Core spending power: visible lines of funding', 2018; Lord Bourne of Aberystwyth, 'Homelessness – Written Statement' HLWS176, 16 October 17; GOV.UK, '£40 Million Homelessness Prevention Programme Announced', Press Release, 17 October 2016; Nigel Adams MP, 'Answer to "Homelessness: Written Question"' HC169323, 03 September 2018.

Shorter-term grants, in the context of cuts to local government spending, make it difficult for local authorities to sustain good practice. Several local authorities interviewed for this paper spoke about the difficulties of prevention work under these circumstances. They described “lurching from year to year” and being unable to plan for the long-term. The cut-off points for grant funding were said to create uncertainty for the future of staff and non-statutory services. For example, one local authority had created new positions in

¹⁴⁹ The Homelessness Reduction Act: Will It Work for Young People?, 14.

homelessness prevention but had only been able to hire workers on fixed-term contracts, as long-term funding could not be guaranteed, meaning institutional expertise could not be developed. This viewpoint is supported by the Greater Manchester Homelessness Action Network, who argued that “deep and sustained cuts”, in addition to a “lack of sustainable funding” has made it difficult to develop long-term preventative and personalised services.¹⁵⁰ Similar problems were encountered at the onset of the Supporting People programme, when a lack of clarity about how long the grant would run for made local authorities reluctant to enter into long-term contracts for services.¹⁵¹

The Government is at cross purposes when funding is allocated to support transformation, but funding cycles are not long enough to sustain it. This is evident with the £20 million Homelessness Prevention Trailblazer Areas programme for 30 local authorities which, according to MHCLG’s evaluation of the programme, has helped with the development of innovative practices that are different from area to area.¹⁵² In Newcastle, its Trailblazer funding has been used to forge a stronger partnership between the local authority, Jobcentre Plus, Crisis and Your Homes Newcastle.¹⁵³ The pilot has placed housing and homelessness leads in local jobcentres to provide training on how to effectively recognise and respond to homelessness and to establish a culture of joint working.¹⁵⁴ In the evaluation, it found that in Newcastle, staff across services “embraced” the view that there was multiple causes of homelessness, which required a collaborative response.¹⁵⁵ Furthermore, one Newcastle resident said that whilst prior to the programme he felt that he was “passed from pillar to post”, he believed Trailblazer staff had been “brilliant” in supporting his needs.¹⁵⁶

However, as argued by Southwark Council in September 2018, as funding was not committed beyond 2019, it is difficult to know whether it will be possible to sustain changes made possible with Trailblazer funding going forward.¹⁵⁷ Targeted, ring-fenced funding for longer periods, therefore, could help to give local authorities the security to develop effective homelessness prevention.

Recommendation 10

Short-term grants for homelessness prevention should be replaced with longer, ring-fenced funding cycles to give local authorities more security to develop effective prevention practices.

3.3 Political short-termism

Youth homelessness prevention may also be hindered by ‘political short-termism’, where the most immediate, visible forms of homelessness are given the most attention. Crisis have argued that the public’s understanding of homelessness prevention is poor, and that a ‘crisis intervention’ mode of thinking is dominant.¹⁵⁸ This overemphasis on immediate and visible forms of homelessness can ‘impede thinking about systemic steps to prevent homelessness’.¹⁵⁹

¹⁵⁰ Greater Manchester Homelessness Action Network, *A Draft Strategy to End Rough Sleeping, and Lay the Foundations of a 10-Year Homelessness Reduction Strategy in Greater Manchester*, by 2020, 2018, 4.

¹⁵¹ Audit Commission, *Supporting People*, 44.

¹⁵² Ministry of Housing, Communities and Local Government, *Evaluation of the Homelessness Prevention Trailblazers*, 2018, 3–5.

¹⁵³ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 266–67.

¹⁵⁴ Ibid., 125.

¹⁵⁵ Ministry of Housing, Communities and Local Government, *Evaluation of the Homelessness Prevention Trailblazers*, 34.

¹⁵⁶ Ibid.

¹⁵⁷ Southwark Council, *Cabinet Meeting: Southwark Homelessness Strategy 2018–22*, 2018, 7.

¹⁵⁸ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 64–65.

¹⁵⁹ Ibid., 65.

The Rough Sleeping Strategy published last year is an example of this.¹⁶⁰ The aim of ending rough sleeping by 2027 is laudable, and the prevention of rough sleeping is the foremost aim of the strategy. Yet it is significant that this was the Government's response to the Public Accounts Committee's call for 'a cross-government strategy for reducing homelessness' in all forms, not just rough sleeping.¹⁶¹ Nonetheless, rough sleeping is now at the centre of the Government's efforts to tackle homelessness; homelessness prevention strategies must now be re-designated as 'homelessness and rough sleeping strategies'.¹⁶² Several interviewees for this paper said that the push to tackle the most visible form of homelessness was not always creating long-term solutions to existing problems. Taking rough sleepers off the streets and relocating them in various forms of temporary accommodation may not necessarily mean that their needs are being addressed, as the premises they go on to be housed in may be unsuitable.¹⁶³ A more forward-looking, evidence-led approach to homelessness prevention is required to prevent all forms of homelessness, including youth homelessness.¹⁶⁴

¹⁶⁰ Ministry of Housing, Communities and Local Government, *Rough Sleeping Strategy*.

¹⁶¹ House of Commons Committee of Public Accounts, *Homeless Households*, 2017, 5; HM Treasury, *Treasury Minutes: Government Response to the Committee of Public Accounts on the Fourth to the Eleventh Reports from Session 2017-2019*, 2018, 29.

¹⁶² Ministry of Housing, Communities and Local Government, *Rough Sleeping Strategy*, 30.

¹⁶³ McCoy and Hug, *Danger Zones and Stepping Stones: Young People's Experiences of Hidden Homelessness*, 42.

¹⁶⁴ Downie et al., *Everybody In: How to End Homelessness in Great Britain*, 64–65, 120.

Conclusion

Local approaches to youth homelessness vary significantly and it cannot be said that young people in need receive the same quality of support across the country. It is evident that the needs of young people are not always considered in local homelessness prevention strategies and that, while some local authorities have fostered collaboration between different organisations to provide young people with timely and wraparound support, others have admitted the need to do more.

Within this context, the HRA has impacted local authorities differently. For some, the HRA has simply formalised processes that already existed, while for others it represents a completely new way of working. The varied success of the new referral system, and the varied quality of personalised housing plans, demonstrate that local authorities are discharging their duties to different standards.

The HRA is an important step towards recognising the role other public bodies play to identify and respond to the early warning signs of youth homelessness, but it does not go far enough. By placing the onus on local housing authorities to prevent youth homelessness, it maintains the view that homelessness is only a housing problem. To enable a truly holistic approach to preventing homelessness, other public bodies must have due regard for young people at risk.

Strong local leadership has been key to determining whether local authorities have embraced the HRA. Indeed, examples of innovative approaches, early intervention, and joint working that were highlighted in this report were often driven by proactive individuals. The difficulty, therefore, is ensuring that a culture of prevention, which embraces early intervention and joint working, is embedded within services.

While steps can be taken at a local level to better prevent youth homelessness and to raise the standard of support given to young people, local authorities can only affect change when it is within their power to do so. A lack of housing stock and current benefit policies, which adversely affect young people, have made homelessness prevention more difficult. Central government must support local authorities to prevent youth homelessness, and must fund them to implement and sustain those strategies. To work in the spirit of the HRA and move towards a genuinely holistic and preventative approach to youth homelessness, joint thinking and planning across departments is needed.

Appendix

Figure 9: Changes under the Homelessness Reduction Act

Improved information and advice: local housing authorities must provide free information and advice on preventing and relieving homelessness. This must be designed to meet the specific needs of vulnerable groups such as care leavers, although young people have not been highlighted as a specific group in HRA guidance.

Duty to refer: a range of public authorities must now notify a local housing authority if they think someone may be homeless or at risk of becoming homeless. These include – but are not limited to – young offender institutions, secure colleges, Jobcentre Plus and Accident and Emergency departments.

Assessments and personalised housing plans (PHPs): local housing authorities are now required to assess all eligible applicants who are homeless or at risk of homelessness, and then work with them to create a personalised action plan to ensure the person is able to access or sustain accommodation.

Duty to prevent homelessness: the HRA extends the period of time in which a person is considered to be “threatened with homelessness” from 28 to 56 days and places a duty on local authorities to “take reasonable steps” to prevent the threatened homelessness of anyone who is eligible, not just those in priority need.

Duty to relieve homelessness: local authorities must take reasonable steps to help any eligible person secure accommodation for 6 months regardless of whether they are priority need or not.¹⁶⁵

Methodology

This project is based on: a review of the available literature on the subject of preventing youth homelessness, two FOI requests sent to all local housing authorities in England, and 45 semi-structured interviews, including with 19 local authorities.¹⁶⁶ Interviewees from local authorities included representatives from housing options, children’s services and elected councillors working in district councils, county councils, unitary authorities and London boroughs.

The first FOI (FOI 1) request was sent to all 326 local authorities in England on the 26th November 2018, and our analysis was based on the responses from 249 local authorities received between 27th November and 11th February 2018. This FOI request asked an open-ended question about the training provided by local housing authorities to other public services with a duty to refer following the Homelessness Reduction Act: “Has any training, or advice, been provided to other public services with a duty to refer following the Homelessness Reduction Act? If so, what?”. The responses were subsequently categorised into three groups: no training provided, written advice given, and in-person training sessions delivered. In addition, 38 responses were categorised as unclear due to responses not detailing what type of training was provided.

The second FOI (FOI 2) related to referrals received under the duty to refer and was sent to all 326 local housing authorities in England. Two hundred and sixty-seven responses were received, based on information relating to April 2018 to December 2018. Forty-eight councils did not hold the required information, and therefore our analysis was based on the remaining 219 responses. The first question asked how many 16-24-year-olds were referred to the local housing authority from organisations with a duty to refer between 3 date ranges: April-June 2018, July-September 2018 and October-December 2018. The

¹⁶⁵ Homeless Link, *Five Key Changes in the Homelessness Reduction Act, 2017*; HM Government, *The Homelessness Reduction Act 2017*.

¹⁶⁶ The data collected from both FOIs is available upon request.

second question looked specifically at October-December 2018 and asked whether the referrals received during this date range resulted in a young person being correctly identified as homeless or at risk of homelessness within 56 days. Sixty-one councils received no referrals during this time-frame, and one individual was awaiting assessment. Therefore, our analysis about the accuracy of the referrals was based on 157 local authorities that received, recorded and processed referrals during this date range.

To determine whether the homelessness prevention strategies published online were up-to-date, in November 2018, *Reform* conducted an online search to find whether each local authority had published their homelessness prevention strategy online. The expiry year of each strategy that had been made available online was recorded. If a strategy could not be located, or it was unclear when or whether a strategy had expired, this was recorded.

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